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WRITER'S DIRECT

November 20, 2001

BY HAND DELIVERY

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Amendment of Section 73.606(b),
TV Table of Allotments.
Facility Id. No. 127342
Des Moines, Iowa

Dear Ms. Salas:

Transmitted herewith are an original and four copies of a "Petition for Reconsideration" with regard to the dismissal of a Petition for Rule Making to substitute Channel 56 for Channel 69 at Des Moines, Iowa.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

Anne Goodwin Crump

Anne Goodwin Crump
Counsel for Caroline K. Powley

Enclosures

cc: Clay C. Pendarvis, Chief, Television Branch (with enclosure) **By Hand Delivery**
Arthur Belendiuk, Esquire (with enclosure)
Marvin J. Diamond, Esquire (with enclosure)
William R. Richardson, Jr., Esquire (with enclosure)
John Shoreman, Esquire (with enclosure)
Stephen C. Simpson, Esquire (with enclosure)

No. of Copies rec'd 0+4
List ABCDE

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.606(b),	)	RM- _____
Television Table of Allotments	)	
(Des Moines, Iowa)	)	
Facility ID No. 127342	)	

Directed to: Chief, Television Branch
Video Services Division, Mass Media Bureau

JOINT PETITION FOR RECONSIDERATION

Frank Duross; Kaleidoscope Partners; Caroline K. Powley; JJJH, LLP; Stead Communications; and ValueVision International, Inc. (the "Petitioners"), who are all of the mutually exclusive applicants for a construction permit for a new television station to operate on Channel 69 at Des Moines, Iowa, hereby respectfully submit their Petition for Reconsideration with regard to the dismissal of their "Joint Petition for Rule Making," filed July 17, 2000, by letter of the Chief, Television Branch, dated October 23, 2001, Reference 2-A726. With respect thereto, the following is stated:

1. As indicated above, the Petitioners are all of the mutually exclusive applicants for a construction permit for a new television station to operate at Des Moines, Iowa. All of the applications as initially filed by the Petitioners specified operation on Channel 69, which had previously been allotted to Des Moines. On January 6, 1998, however, the Commission issued a Report and Order in ET Docket No. 97-157, wherein it reallocated Channels 60-69 for public safety use and commercial fixed, mobile, and broadcasting services. Therefore, pursuant to the

Commission's *Public Notice*, DA 99-2605, released November 22, 1999, ("November 22 Notice") as extended by *Public Notice*, DA 00-536, released March 9, 2000, the Petitioners submitted their "Joint Petition for Rule Making" on July 17, 2000, seeking to substitute Channel 56 for Channel 69 at Des Moines.[1] The Technical Narrative attached thereto demonstrated compliance with the interference protection requirements of Section 73.623(c) of the Commission's Rules, based upon studies made in accordance with the procedures adopted by the Commission and outlined in OET Bulletin No. 69.

2. The letter of the Chief, Television Branch, however, concludes that the Petitioners' proposal fails to meet the interference requirements of Section 73.623(c) of the Commission's Rules, based upon the finding that the proposed facilities would cause 0.8 percent interference to the DTV allotment of Station KWQC-DT, Davenport, Iowa. Engineering counsel for the Petitioners has been informed that this conclusion was reached based upon the Commission's current interference prediction software. *See* Exhibit 1, attached hereto. Reliance upon the software in this instance is misplaced, however, as the procedures used by Commission's current program conflict with the published requirements of OET Bulletin No. 69. Use of OET Bulletin No. 69 is specifically required in Section 73.623(c)(2) of the Commission's Rules, however. Accordingly, use of an inconsistent program cannot be used as a basis for a finding of impermissible interference.

3. The November 22 Public Notice provided that the window filing opportunity provided

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[1] On that date, Petitioners also submitted a "Joint Request for Approval of Universal Settlement," whereby the application of Caroline K. Powley will be the remaining application. It is anticipated that, upon approval of the Petitioners' rule making request, Ms. Powley's surviving application will be amended to specify operation on Channel 56 at the Stead Communications proposed transmitter site.

therein would be open for "petitions for rule making seeking a new channel below channel 60 for those applicants with pending applications for new full-service NTSC television stations on channels 60-69...." November 22 Public Notice at 1. Furthermore, the November 22 Public Notice required that "[p]etitions to change the channel of an existing allotment must protect DTV stations as provided in Section 73.623(c)...." November 22 Public Notice at 5. As noted above, Section 73.623(c) specifically indicates that the methodology described in OET Bulletin No. 69 is to be used in predicting the percentage of interference which will be created by a proposed facility. In developing the proposed channel substitution, engineering counsel for the Petitioners made use of an interference prediction program based on the procedures outlined in OET Bulletin No. 69. *See* Exhibit 1. Through use of that program, engineering counsel for the Petitioners found that the proposed substitute channel will meet the requirements of Section 73.623(c) of the Commission's Rules and will not create any impermissible interference to any other station.

4. As set forth in the attached Technical Statement, however, the actual interference prediction program used by the Commission differs from the methodology outlined in OET Bulletin No. 69 as published by the Commission. Specifically, in Table 7 of OET Bulletin No. 69, the culling distance to be used in analyzing a co-channel analog into digital proposal is 250 kilometers. In contrast, engineering counsel for the Petitioners has been informed that the Commission's interference prediction software uses a culling distance of 300 kilometers. *Id.* Because of this increased culling distance, the Commission's software predicts a greater apparent amount of interference. The Commission, however, is precluded from, without notice or explanation, departing from the methods which it has by its own rules required to be used. Those

methods, with their culling distance of 250 meters, show that the Petitioners' proposed facilities will not create any prohibited interference to KWCQ-DT. The Commission may not, *post hoc*, adopt new standards by which to judge the Petitioners' proposal. In this instance, the Commission has published one standard for calculating interference, but it is actually applying quite another standard to assess the Petitioners' proposed channel substitution. Such a modification of the basic methods by which the Commission assesses a proposal is particularly unacceptable when it is made silently, through development of new software, without any notice whatsoever to the public.

5. It is a fundamental principle that the Commission is bound to abide by its own rules. *Acherner Broadcasting v. FCC*, 62 F.3d 1441 (D.C. Cir. 1995). *See also*, *Teleprompter Cable Communications Corp. v. FCC*, 565 F.2d 736 (D. C. Cir. 1977). Those rules specify the use of OET Bulletin No. 69, a written document prepared and released by the Commission itself. The published version of that bulletin explicitly specifies a culling distance of 250 kilometers. The Commission specifically invited applicants and petitioners to amend their proposals in compliance with the rule which specifies use of OET Bulletin No. 69. The Commission may not then adopt some different methodology for assessing proposals after they are submitted without any notice to the public. Should the Commission find that a new method of predicting interference is preferable, it is free to adopt such a new method, but it may not apply that new standard retroactively. While the Commission may always conduct a reasoned analysis and determine that its interference prediction methods should be revised, the Commission did not undertake such a process in this instance. Even if it had done so, fundamental fairness requires that parties with pending proposals must be allowed an opportunity to come into compliance with

those new requirements.[2] It would be simply unacceptable for the Commission to adopt a new method, in conflict with its own rules, and to apply that procedure to a pending proposal retroactively and without notice. The Petitioners have demonstrated that their proposal complies with the Commission's Rules in effect at the time that their proposal was filed, and as they continue exist at this time. Since the proposal put forward by the Petitioners complies with the Commission's Rules, in that their consulting engineer properly calculated that no prohibited interference would be caused through use of the methods prescribed by the Commission, the petition for rule making may not be dismissed based solely upon internal processing methods which conflict with the Rules.

6. In sum, the Commission's November 22 *Public Notice* invited applicants in the circumstances of the Petitioners to submit rule making petitions for new channels, so long as such petitions complied with Section 73.623(c) of the Commission's Rules, which references use of OET Bulletin No. 69 to determine interference percentages. The Petitioners then did exactly as they had been invited to do, and submitted a rule making petition in compliance with the Commission's specified procedures. Specifically, the Petitioners' consulting engineer determined that no impermissible interference would be caused by using a program based on the methods set forth in OET Bulletin No. 69 as published by the Commission. The Commission's staff itself did not follow the methods which had been prescribed, however, in analyzing the Petitioners' proposal. Rather, it used software based upon somewhat different criteria, and only

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[2] In the instant case, as set forth in the attached Technical Statement, the Petitioners' proposal can be slightly modified such that no impermissible interference will be created, even using the Commission's newer software analysis.

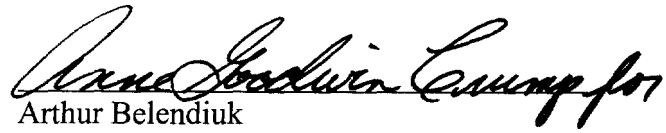
through use of this different software did it find predicted interference. On this basis, the Commission's staff concluded that the Petitioners' proposal should be dismissed.

7. It should go without saying, however, that the Petitioners' use of methodology prescribed by the Commission itself cannot be used against the Petitioners as a reason for dismissal. If the Commission's staff finds better methods of analysis, it must give notice of the change and allow applicants the opportunity to comply. Obviously, no agency could rationally function on the basis of punishing applicants for following rules and expecting them to divine new requirements without any notice. Nonetheless, these are precisely the circumstances in which the Petitioners now find themselves. Because the Petitioners' engineer used the methods which the Commission stated should be used, rather than the methods which the Commission actually uses itself, their petition has been dismissed. This result is unsupportable, and the Petitioners' Petition for Rule Making must be reinstated. Should the Commission determine that use of its software program provides better results than those provided by the previously stated methodology, then the Petitioners must be allowed an opportunity to amend their proposal to demonstrate compliance with the previously unstated requirements.

WHEREFORE, the premises considered, the Petitioners respectfully request that the letter of the Chief, Television Branch be reconsidered and that the Petitioners' Petition for Rule Making be reinstated and processed to grant.

Respectfully submitted,

FRANK DUROSS

By: 
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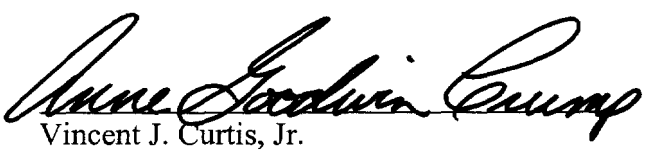
CAROLINE K. POWLEY

By: 
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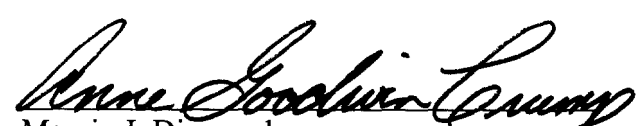
Her Attorneys

JJJH, LLC

By: 
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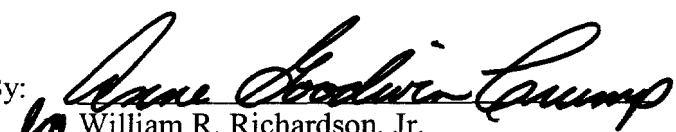
VALUEVISION INTERNATIONAL, INC.

By: 
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Washington, D.C. 20037
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Its Attorney

November 20, 2001

agc/#150/petrecondmoines.b&c

EXHIBIT "1"

TECHNICAL STATEMENT
PREPARED IN SUPPORT OF
A PETITION FOR RECONSIDERATION TO
MODIFY THE NTSC ALLOTMENT TABLE
CHANNEL 56
DES MOINES, IOWA

This technical statement has been prepared on behalf of the joint Petitioners in support of a *Petition for Reconsideration* to modify the NTSC allotment at Des Moines, Iowa by the proposed substitution of channel 56 for channel 69.

The Petitioners filed a *Petition for Rulemaking* (FCC File No. BPRM-20000717ACU) to substitute channel 56 for the channel 69 NTSC allotment at Des Moines. The Federal Communications Commission (FCC) recently issued a letter dismissing the channel 56 *Petition for Rulemaking*, stating the proposal failed to meet the interference requirements of Section 73.623(c) of the FCC Rules. Specifically, the FCC noted that the proposal would cause 0.8 percent interference to the DTV allotment of station KWQC-TV on channel 56 at Davenport, Iowa.

In reviewing the original channel 56 interference study which was prepared employing the du Treil, Lundin & Rackley, Inc. (dLR) DTV interference analysis program[1], and comparing it to an analysis prepared employing the FCC's own processing software, it was determined that the amount of predicted interference toward KWQC-DT differs because of the procedures the FCC's software employs. Specifically, in Table 7 of OET Bulletin No. 69, the culling distance[2] for a co-channel analog into digital situation is 250 kilometers. This

---

1 The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based information contained in the FCC's Sixth Report and Order; subsequent Memorandum Opinion and Order; and the procedures contained in the FCC's OET Bulletin No. 69. A nominal grid size resolution of 1 km was employed. An Alpha based processor computer system was employed.

is the same value that is employed in the dLR interference program. However, in reviewing the FCC's program code, it has been determined that a culling distance of 300 kilometers is employed. It is believed that because of this 50 kilometer difference, the FCC's processing program calculates a larger amount of interference toward the KWQC-TV DTV allotment. These differences have been verified through a test as shown in Figures 1 and 2.

Figure 1 is a summary of the interference analysis which was prepared employing the dLR processing software, and based on the procedures outlined in OET Bulletin No. 69 (250 km culling distance). As shown on Sheet 3 of Figure 1, the channel 56 proposal causes unique interference to 3,161 persons. This amounts to less than 0.5% of the KWQC allotment baseline population, and is therefore considered *de minimis*.

Figure 2 is an interference analysis in which all of the input parameters and stations remain the same and the culling distance has been increased to 300 kilometers, to simulate the FCC code implementation. As shown on Sheet 3 of Figure 2, the predicted unique interference toward the KWQC DTV allotment increases to 13,894 persons which is greater than 0.5% of the base population, and is therefore considered prohibited interference. Thus it appears that because the FCC's processing software employs a culling distance different than that specified in Table 7 of OET Bulletin No. 69, impermissible interference is calculated.

Consequently, because the proposal does comply with the FCC Rules, based on the procedures outlined in OET Bulletin No. 69, the channel 56 Petition should be reinstated.

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[2] The culling distance is defined as the maximum distance a cell from an undesired station may lie from a desired cell.

If the FCC intends to process applications and petitions using a culling distance different than what is expressly shown in the OET-69 Bulletin, it should make a revision to Table 7 of the OET-69 Bulletin through a public statement (release). Furthermore, although it is believed the channel 56 proposal complies with the FCC standards using the OET-69 procedures, the petitioner should at least have the opportunity to amend its proposal to comply with the FCC's version (increased culling distance). If the Des Moines proposal reduces its non-directional ERP to 1300 kilowatts or proposes a directional operation with suppression toward the KWQC DTV allotment, the proposal does not fail the present FCC OET-69 processing software.

If there are questions concerning this Technical Statement, please communicate with the office of the undersigned.

John A. Lundin

Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

November 19, 2001

Study Date: 20011119
INTERFERENCE RECEIVED BY KWQC DTV ALLOTMENT (250 km culling distance)
CELL SIZE : 1.00 km
Using offset in determining thresholds
Per 6th Report & Order and FCC OET-69 Bulletin

****
DKWQCT 41-32-49 090-28-35 56(0) 1000.000 kw-DA 611 m AMSL 90.0 % 42.4 dBu
DAVENPORT IA 36341 1070 DTVSERVICE: 1070000 NTSCSERVICE: 941000
DTVALT DTV ALLOTMENT
1.00 1.00 1.00 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
0.99 0.99 0.99 0.99 0.99 0.99 0.99 1.00 1.00 1.00 1.00 1.00
Ref Az: 0.0
Using DEFAULT vertical antenna pattern
USING NTSC GRADE B FOR SERVICE AREA

	Area	Pop
within Noise Limited Contour	39545.46 sq km	1267100
not affected by terrain losses	38513.52	1185139

****
DKWWL 42-24-04 091-50-43 55(0) 1000.000 kw-DA 887 m AMSL 10.0 % 42.3 dBu
WATERLOO IA 42494 922 DTVSERVICE: 922000 NTSCSERVICE: 780000
DTVALT DTV ALLOTMENT
0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 1.00 1.00
1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00
1.00 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
Ref Az: 0.0
Using DEFAULT vertical antenna pattern

D/U Baseline: -28.00 dB

	Area	Pop
Interference	1138.96 sq km	57710

****
WYIN(TV) 41-20-56 087-24-02 56(+) 1350.000 kw 517 m AMSL 10.0 % 65.4 dBu
GARY IN 15198 4390 FCC NTSC BL: 4408417 FCC IX POP%: 1.8
LIC BLET19880105KE
Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00 dB

	Area	Pop
Interference	428.09 sq km	12647

```
******************************
 NEW(TV)     41-38-05 093-34-46  56(+) 5000.000 kw   418 m AMSL  10.0 % 65.4 dBu
DES MOINES           IA
ADD      BPRM20000717ACU
Using DEFAULT vertical antenna pattern


D/U Baseline:     2.00 dB
                                    Area                Pop
Interference                        280.81 sq km      12860


******************************
 DKMOV     38-31-47 090-17-58  56(0) 1000.000 kw-DA  487 m AMSL  10.0 % 42.4 dBu
ST. LOUIS        MO 32806     2762   DTVSERVICE: 2762000   NTSCSERVICE: 2723000
DTVALT  DTV ALLOTMENT
0.95  0.95  0.94  0.94  0.94  0.94  0.94  0.93  0.93  0.93  0.93  0.94
0.94  0.94  0.94  0.94  0.94  0.94  0.94  0.94  0.95  0.95  0.96  0.96
0.96  0.97  0.97  0.97  0.98  0.98  0.99  1.00  0.99  0.98  0.97  0.96
(316.0 1.00)
Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:    15.00 dB
                                    Area                Pop
Interference                        181.64 sq km       1774


******************************
 DWFRVT   44-24-21 088-00-19  56(0) 1000.000 kw-DA  570 m AMSL  10.0 % 42.4 dBu
GREEN BAY        WI 35496     1037   DTVSERVICE: 1037000   NTSCSERVICE:  988000
DTVALT  DTV ALLOTMENT
0.88  0.88  0.89  0.90  0.91  0.92  0.93  0.94  0.95  0.95  0.96  0.97
0.98  0.98  0.99  0.99  0.99  1.00  1.00  0.98  0.96  0.94  0.92  0.91
0.90  0.90  0.89  0.89  0.89  0.89  0.89  0.89  0.88  0.88  0.88  0.88
Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:    15.00 dB
                                    Area                Pop
Interference                        0 sq km            0
```

```
*****************************
 WEEK-DT  40-37-46 089-32-53  57(N) 452.000 kw-DA  402.3 m AMSL 10.0 % 42.5 dBu
PEORIA          IL 15183     573   DTVSERVICE:  573000   NTSCSERVICE:  567000
CP      BPCDT19991026ABD
0.68  0.75  0.75  0.66  0.76  0.93  1.00  0.94  0.78  0.68  0.75  0.75
0.66  0.76  0.93  1.00  0.94  0.78  0.68  0.75  0.75  0.66  0.76  0.93
1.00  0.94  0.78  0.68  0.75  0.75  0.66  0.76  0.93  1.00  0.94  0.78
( 15.0 0.77)(195.0 0.77)(285.0 0.77)


Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:  -26.00 dB
                                 Area              Pop
Interference                     681.41 sq km      34727
*****************************
lost to NTSC IX                  708.90            25507
lost to additional IX by DTV    1599.45            74587
total lost to DTV IX            1897.94            92821

CallSign    No.cells   Unique Area       Unique Pop
DKWWL           1024   1005.426           48013
WYIN             273   268.0482            4112
NEW              145   142.3699            3161 (0.3%)
DKMOV             63   61.85728             361
WEEK-T           511   501.7313           25917

lost to all IX                  2308.36          100094

Total SERVICE                  36205.16         1085045
```

Study Date: 20011119
INTERFERENCE RECEIVED BY KWQC DTV ALLOTMENT (300 km culling distance)
CELL SIZE : 1.00
Using offset in determining thresholds
Per 6th Report & Order and FCC OET-69 Bulletin

****
DKWQCT 41-32-49 090-28-35 56(0) 1000.000 kw 611 m DA 90.0 % 42.4 dBu
DAVENPORT IA 36341 1070 DTVSERVICE: 1070000 NTSCSERVICE: 941000
DTVALT DTV ALLOTMENT
1.00 1.00 1.00 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
0.99 0.99 0.99 0.99 0.99 0.99 0.99 1.00 1.00 1.00 1.00 1.00
Ref Az: 0.0
Using DEFAULT vertical antenna pattern
USING NTSC GRADE B FOR SERVICE AREA

	Area	Pop
within Noise Limited Contour	39545.46 sq km	1267100
not affected by terrain losses	38513.52	1185139

****
DKWWL 42-24-04 091-50-43 55(0) 1000.000 kw 887 m DA 10.0 % 42.3 dBu
WATERLOO IA 42494 922 DTVSERVICE: 922000 NTSCSERVICE: 780000
DTVALT DTV ALLOTMENT
0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 1.00 1.00
1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00
1.00 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
Ref Az: 0.0
Using DEFAULT vertical antenna pattern

D/U Baseline: -28.00 dB

	Area	Pop
Interference	1138.96 sq km	57710

****
WYIN 41-20-56 087-24-02 56(+) 1350.000 kw 517 m 10.0 % 65.4 dBu
GARY IN 15198 4390 FCC NTSC BL: 4408417 FCC IX POP%: 1.8
LIC BLET19880105KE
Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00 dB

	Area	Pop
Interference	458.53 sq km	13584

```
******************************
 NEW      41-38-05 093-34-46  56(+) 5000.000 kw 418     m 10.0 % 65.4 dBu
DES MOINES          IA
ADD     BPRM20000717ACU
Using DEFAULT vertical antenna pattern


D/U Baseline:    2.00 dB
                                  Area              Pop
Interference                      334.81 sq km      24017


******************************
 DKMOV    38-31-47 090-17-58  56(0) 1000.000 kw 487     m DA   10.0 % 42.4 dBu
ST. LOUIS       MO 32806    2762   DTVSERVICE: 2762000   NTSCSERVICE: 2723000
DTVALT  DTV ALLOTMENT
0.95  0.95  0.94  0.94  0.94  0.94  0.94  0.93  0.93  0.93  0.93  0.94
0.94  0.94  0.94  0.94  0.94  0.94  0.94  0.94  0.95  0.95  0.96  0.96
0.96  0.97  0.97  0.97  0.98  0.98  0.99  1.00  0.99  0.98  0.97  0.96
(316.0 1.00)
Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:   15.00 dB
                                  Area              Pop
Interference                      225.83 sq km      5017


******************************
 DWFRVT   44-24-21 088-00-19  56(0) 1000.000 kw 570     m DA   10.0 % 42.4 dBu
GREEN BAY       WI 35496    1037   DTVSERVICE: 1037000   NTSCSERVICE:  988000
DTVALT  DTV ALLOTMENT
0.88  0.88  0.89  0.90  0.91  0.92  0.93  0.94  0.95  0.95  0.96  0.97
0.98  0.98  0.99  0.99  0.99  1.00  1.00  0.98  0.96  0.94  0.92  0.91
0.90  0.90  0.89  0.89  0.89  0.89  0.89  0.89  0.88  0.88  0.88  0.88
Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:   15.00 dB
                                  Area              Pop
Interference                      26.51 sq km       360
```

```
*****************************
 WEEK-T   40-37-46 089-32-53  57(N)  452.000 kw 402.3   m DA   10.0 % 42.5 dBu
PEORIA          IL 15183     573   DTVSERVICE:  573000   NTSCSERVICE:  567000
CP      BPCDT19991026ABD
0.68  0.75  0.75  0.66  0.76  0.93  1.00  0.94  0.78  0.68  0.75  0.75
0.66  0.76  0.93  1.00  0.94  0.78  0.68  0.75  0.75  0.66  0.76  0.93
1.00  0.94  0.78  0.68  0.75  0.75  0.66  0.76  0.93  1.00  0.94  0.78
( 15.0 0.77)(195.0 0.77)(285.0 0.77)
Ref Az:   0.0
Using DEFAULT vertical antenna pattern


D/U Baseline:  -26.00 dB
                                        Area              Pop
Interference                          681.41 sq km       34727
*****************************
lost to NTSC IX                        773.71            37423
lost to additional IX by DTV          1581.78            74495
total lost to DTV IX                  1942.12            93345

CallSign     No.cells   Unq Area          Unq Pop
DKWWL            1024   1005.426            48013
WYIN              259   254.3022             4673
NEW               155   152.1886            13894 (1.3%)
DKMOV              42   41.23819              262
DWFRVT              3   2.945585                7
WEEK-T            509   499.7675            25892

lost to all IX                        2355.49           111918

Total SERVICE                        36158.04          1073221
```